

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.: 05-398-01 (PRATTER, J.)
v.	:	DATE FILED: March 14, 2006
EDWARD ROSS	:	VIOLATIONS:
	:	21 U.S.C. § 841(a)(1) (distribution
	:	of cocaine - 4 counts)
	:	21 U.S.C. § 841(a)(1)(possession with
	:	intent to distribute 500 grams or more
	:	of cocaine - 1 count)
	:	18 U.S.C. §924(c)(1) (carrying a firearm
	:	during a drug trafficking crime - 1 count)
	:	18 U.S.C. § 924(c)(1) (possession of a firearm in
	:	furtherance of a drug trafficking
	:	crime - 1 count)
	:	18 U.S.C. § 922(o) (possession of a
	:	machine gun - 1 count)
	:	18 U.S.C. § 922(g)(1) (felon in possession
	:	of a firearm - 2 counts)
		Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 25, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture and substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 22, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS

knowingly and intentionally possessed with intent to distribute 500 grams or more, that is, approximately 660 grams of, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS

knowingly used and carried a firearm, that is, a Colt double action revolver, model Detective Special, caliber .38 special, serial number C07946, loaded with live ammunition, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS

knowingly possessed a firearm, that is, a Quality Firearms Incorporated semiautomatic pistol, model S.A. 25, caliber .25 A.C.P., serial number obliterated, and a S.W.D. M-11-NINEmm semiautomatic pistol (converted to a machine gun), caliber 9mm, serial number 89-0035335, loaded with live ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1), (c)(1)(A)(i), (c)(1)(B)(ii).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS

knowingly possessed a machine gun, that is, a S.W.D. M-11/NINEmm semiautomatic pistol (converted to a machine gun), caliber 9mm, serial number 89-0035335, loaded with live ammunition.

In violation of Title 18, United States Code, Section 922(o)(1).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Colt double action revolver, model Detective Special, caliber .38 special, serial number C07946, loaded with live ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania, defendant

EDWARD ROSS,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Quality Firearms Incorporated semiautomatic pistol, model S.A. 25, caliber .25 A.C.P., serial number obliterated, and a S.W.D. M-11/NINEmm semiautomatic pistol (converted to a machine gun), caliber 9mm, serial number 89-0035335, loaded with live ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1), 922(o), and 924(c) set forth in this indictment, defendant

EDWARD ROSS

shall forfeit to the United States of America all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

1. One Colt double action revolver, model Detective Special, caliber .38 special, serial number C07946, loaded with live ammunition;
2. One Quality Firearms Incorporated semiautomatic pistol, model S.A. 25, caliber .25 A.C.P., serial number obliterated;
3. One S.W.D. M-11/NINEmm semiautomatic pistol (converted to a machine gun), caliber 9mm, serial number 89-0035335, loaded with live ammunition; and,
4. one box of .38 caliber ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY